

DOWNWINDERS

966 East Wilson Avenue Salt Lake City, Utah 84105, Phone (801)-467-3238, Fax (801)-467-2231

Salt Lake City, Utah
January 21, 1993

Director
Division of Water Quality
288 North 1460 West
Salt Lake City, Utah 84114-4870

Larry —

For Response

nto

JAN 1993
Received
Division of
Water Quality

Dear Sir;

I am writing to express my comments on the proposal of Molycorp, Inc. to dispose of vanadium tailings containing NORM materials into the workings of an existing uranium mine. I wish to express my total and complete opposition to not only the proposal itself, but with regards to the basic concept of this type of disposal itself.

While there are a number of specific reasons for this opposition, and a variety of technical and environmental issues that need to be resolved, the major concern rests with the dangerous precedent approval of this project would set. The south eastern section of Utah presently contains a number of tailing sites left over from both Uranium and Vanadium mining where radioactive waste remains in the tailings. Several of these will require actions to be taken over the next decade to secure their permanent and safe disposal. Each of these will require study and careful planning to find the best and most appropriate solution for their disposal. Extensive studies have been carried out by a variety of agencies as to the safest, most proper manner in which such tailings should be disposed of.

Backfilling of old mine workings has not been one of the solutions receiving favorable recommendations. In fact it is one solution that has appeared somewhat "Johnny-come-lately" in a several decade long process of study and debate. In essence it has never yet received the extensive deliberation handed out by every responsible agency to every other proposed approach. Furthermore, without extensive review and hearings open to the public, your Department's review of this proposal will do very little to change that situation and serves as a classic example of why this proposal should be rejected.

Without extensive and prolonged study of the safety, especially the long-term safety of this concept, approval by your Department of the Molycorp, Inc proposal will set a dangerous precedent that could potentially open the

floodgates on widespread application of this principle regarding existing tailings and encourage commercial interests to pursue bringing similar wastes from outside the state here for disposal. All involving an unproven concept that will be extremely difficult for the State of Utah to effectively monitor and which in time could leave the State stuck with very expensive and difficult problems to solve.

Disposal into existing mine workings, especially if after establishing the precedent expands to several sites, prevents the type of monitoring currently carried out by the State at the existing NORM disposal site. Providing adequate monitoring of the Molycorp site, as well as others that will follow will require increases in both manpower and budget for those State agencies involved. This at a time when the current budget is barely adequate. The bottom line that will result will be a deterioration of public safety and increased risk of long-term environmental problems.

It is much wiser for the State to develop a long term program to deal with the tailings problem and to concentrate its monitoring and oversight activities on a single site and not have to constantly chase across the state from one old mine to another. Existing methods of landfill disposal offers effective monitoring and regulation by the state, the Small Fry Mine site does not, and will not at anytime in the future. Should leakage into surrounding environments or into the local groundwater occur at conventional landfill sites, containment liners or covering caps of earth can be replaced or repaired at moderate expense, at the Small Fry Mine or similar sites what are you going to do, replace a mountain? Furthermore how are you going to detect the problems before they occur? Is your Department going to expend the resources to establish a permanent State monitoring facility at the site as it does with the existing landfill site? I think not, yet without such activities your department and the state will fail its duty to protect the public health.

Has your department considered what will happen should approval of the Molycorp proposal produce additional permit request from other interests? Is your department prepared to monitor such activities to insure only NORM wastes are disposed of and that such disposal methods don't become a convenient means to dispose of more contaminated materials left over from uranium processing or other sources. Face it once something is down the shaft it quickly is out of sight and out of mind -- at least until leakages appear in groundwater by which time its too late.

The problems with groundwater contamination from past mining activities at Bingham Canyon should serve as a case in point. With current estimates of up to \$2.2 billion to resolve that mess is it really in the State's interest to approve an untried and untested method of mine-workings disposal of anything potentially toxic, not to mention added danger of water soluble radioactive compounds?

I would strongly request that the Division of Water Quality not approve this proposal until it holds public hearings on the subject not only in the area surround-

ing the proposed project but elsewhere in the state as well, and to not entertain similar proposals in the future until all appropriate state agencies have developed a long term comprehensive policy regarding disposal of radioactive tailings. Until such time disposal only in existing and approved sites should be allowed.

Sincerely,

A handwritten signature in black ink, appearing to read "Preston J. Truman", with a stylized flourish at the end.

Preston J Truman
Director
Downwinders, Inc.